



Kerri E. Chewning
Kchewning@archerlaw.com
856-616-2685 Direct
AuthorFaxNoArcher & Greiner, P.C.

One Centennial Square
33 East Euclid Avenue
Haddonfield, NJ 08033
856-795-2121 Main
856-975-0574 Fax
www.archerlaw.com

May 21, 2020

VIA CM/ECF ONLY

Hon. Renée Marie Bumb
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Room 1050
Camden, NJ 08101

Re: U.S. Asia Global, Inc. v. GlobalGeeks, Inc., No. 1:20-cv-05793-RMB

Dear Judge Bumb:

This firm represents GlobalGeeks, Inc. (“GlobalGeeks”) in the above-referenced matter. This letter addresses and responds to the Court’s Text Orders in Docket Entry Nos. 17 and 18.

As to Plaintiff’s application for a Preliminary Injunction (Docket Entry No. 7), please note that GlobalGeeks filed its opposition to the motion on May 19, 2020 (Docket Entry No. 12) in accordance with the Court’s Order dated May 13, 2020 (Docket Entry No. 8). GlobalGeeks does not intend to submit any further response at this time.

With respect to the Court’s inquiry about releasing the masks, please be advised that GlobalGeeks has thus far refused to release the 476,000 masks in its warehouse to the Plaintiff, because GlobalGeeks has never conducted any business with the Plaintiff. GlobalGeeks ordered the 476,000 masks from a third-party, SZN, LLC (“SZN”), not U.S. Asia Global, Inc. Prior to the initiation of this suit, GlobalGeeks was subject to two competing demands, a demand for payment from SZN and a demand for the goods from Plaintiff. Given the lack of clarity regarding the relationship between Plaintiff and SZN, as well as the competing demands, GlobalGeeks does not intend to release the 476,000 masks without some determination of ownership as between SZN and Plaintiff. GlobalGeeks has also refused to return the 476,000 masks to SZN, because of an ongoing dispute with SZN relating to another shipment of masks for which SZN owes GlobalGeeks in excess of \$1 million.

Finally, in response to the Text Order at Docket Entry 18, please be advised that GlobalGeeks does not object to Plaintiff’s counsels’ pending motions for admission *pro hac vice* (Dkt. Nos. 5 and 15).

Hon. Renée Marie Bumb, U.S.D.J.
May 21, 2020

We thank the Court for its attention to these matters.

Respectfully yours,

/s/ Kerri E. Chewning

KERRI E. CHEWNING

cc: Joseph Zaffarese, Esquire
Aleena Yasmeen Sorathia, Esquire
S. Joshua Kahane, Esquire
Benjamin J. Eichel, Esquire

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